



U.S. Department of Justice

*United States Attorney
Southern District of New York*

86 Chambers Street
New York, New York 10007

January 20, 2022

VIA ECF

Hon. Ronnie Abrams
United States District Judge
United States District Court
40 Foley Square
New York, New York 10007

Re: *Chunxia Zhao v. Mayorkas et al.* No. 21 Civ. 10845 (RA)

Dear Judge Abrams:

This Office represents the government in this action in which the plaintiff seeks an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate an Application to Register Permanent Residence or to Adjust Status (Forms I-485). On behalf of the government, I write respectfully to request that the initial conference presently scheduled for January 28, 2022, be adjourned until on or after March 7, 2022.

The adjournment is respectfully requested because the plaintiff served this Office by mail on December 22, 2021, and thus the response to the complaint is not due until February 23, 2022. *See Fed. R. Civ. P. 12(a)(2), 6(d).* The government is still determining the status of the plaintiff’s application as well as the steps in the adjudicative process and the timing therefor. The parties thus respectfully submit that an adjournment until March 7, 2022 (*i.e.*, the Friday of the week following the current due date for the government’s response to the complaint) or thereafter would be in the interests of efficiency and conservation of judicial and party resources. This is the first request to adjourn the initial conference. The plaintiff consents to this request.

I thank the Court for its consideration of this letter.

Application granted.

The initial conference is hereby adjourned to March 10, 2022 at 4:30 p.m.. The parties shall use the following dial-in information to call in to the conference: Call-in Number: (888) 363-4749; Access Code: 1015508. This conference line is open to the public.

The parties' joint letter and proposed case management plan shall be filed on or before March 3, 2022.

SO ORDERED.

Hon. Ronnie Abrams
01/21/2022

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: s/Jacqueline Roman
JACQUELINE ROMAN
Special Assistant United States Attorney
Telephone: (347) 714-3363
E-mail: jacqueline.roman@usdoj.gov